



January 30, 2025

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Hon. Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 1105  
New York, NY 10007

Re: *ChemImage Corp. v. Johnson & Johnson et al.*, No. 1:24-cv-2646 (JMF)  
Letter Motion for Leave to File Deposition Transcripts in Redacted Form

Dear Judge Furman:

We represent Defendants Johnson & Johnson and Ethicon, Inc. (together, “Defendants”). We write pursuant to this Court’s Standing Order 19-MC-583, Section 6 of the S.D.N.Y. Electronic Case Filing Rules and Instructions, and Rule 7(C) of the Court’s Individual Rules and Practices in Civil Cases to respectfully seek leave to file Exhibits 1 and 2 to Defendants’ Letter Motion for Leave to File a Deposition Transcript to the Parties’ Joint Pretrial Order (the “Letter”) in redacted form on ECF .

As the parties’ advise in their Joint Pretrial Order (ECF No. \_\_),<sup>1</sup> Defendants are seeking leave to file Ms. Tamara Lanier and Mr. Hani Abouhalka’s transcripts (attached as Exhibits 1 and 2 to this Letter) in redacted form. Plaintiff has designated portions of Ms. Lanier and Mr. Abouhalka’s transcripts (collectively, the “Redacted Materials”) to be offered in its case-in-chief pursuant to Rule 6(A)(xi) of the Court’s Individual Rules and Practices in Civil Cases, which Defendants have designated as Highly Confidential pursuant to the parties’ Protective Order, ECF No. 56. The Redacted Materials reflect nonpublic, competitively sensitive business information, the public disclosure of which would cause competitive harm to Defendants. *Playtex Prods., LLC v. Munchkin, Inc.*, No. 14-1308-RJS, 2016 WL 1276450, at \*11 (S.D.N.Y. Mar. 29, 2016) (granting request to seal documents concerning “research and development for new products”). Moreover, the proposed redaction is narrowly tailored to one quote from Highly Confidential discovery material and is consistent with the parties’ Court-approved redactions of sensitive information in other filings in this case. *See, e.g.*, Dkt. Nos. 16,

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<sup>1</sup> To be assigned.

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29. Defendants conferred with Plaintiff on January 30, 2025, as required by Rule 7(C) of the Court's Individual Rules and Practices and Plaintiff does not object to the relief sought in this motion.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Rachel Sherman

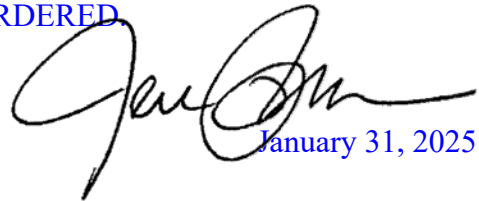
Rachel Sherman

cc: All counsel of record (via ECF)

The motion to seal is granted temporarily. The Court will decide whether to keep the documents sealed permanently in connection with its ruling after trial.

The Clerk of Court is directed to terminate ECF Nos. 131 and 132.

SO ORDERED

A handwritten signature in black ink, appearing to read 'J. Furman', is written over the typed name 'January 31, 2025'.

January 31, 2025